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9 Attorneys for William Sorgen

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 WILLIAM SORGEN,

13 Plaintiff,

14 vs.
15

16 The CITY AND COUNTY OF SAN
FRANCISCO, San Francisco Police Chief
17 HEATER FONG, San Francisco Police
Officer BRIAN OLIVER (#776), and DOES
18 1-20,

19 Defendants.
20

Case No. C-05-03172-TEH

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
CUTOFF.**

21 The Parties, through their undersigned counsel, hereby stipulate and request that the
22 Court extend the discovery cutoff date from July 3, 2006, to August 28, 2006.

23 The Parties agree that the extension of the discovery cutoff shall be for the limited
24 purposes as follows:

- 25 1.) To complete the deposition of Defendant Brian Oliver.
26 2.) To complete the deposition of percipient witness Dominic Campese.
27
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3.) To complete Defendant's disclosures of items in Plaintiff's First Request for Production of Documents.

4.) To adjudicate the remaining discovery dispute concerning the Defendant's putative duty to disclose items requested in Plaintiff's First Request for Production of Documents number 28 (certain prior arrest reports of Brian Oliver).

The Parties agree that Good Cause exists for this extension and accordingly respectfully request the Court grant this petition.

Respectfully Submitted,

DATED: July _11_, 2006

JOHN VIOLA
BEN ROSENFELD

By: /S/
JOHN VIOLA
Attorneys for Plaintiff

DATED: July _11_, 2006

DENNIS J. HERRERA
City Attorney
JOANNE HOEPER
Chief Trial Deputy
PETER J. KEITH
Deputy City Attorneys

By: /S/
PETER J. KEITH
Attorneys for Defendants

PURSUANT TO STIPULATION, IT IS SO ORDERED with the strict understanding that no other trial or pretrial dates shall be changed or modified as a result of this Order.

Dated: 07/17/06



HONORABLE THELTON E. HENDERSON
UNITED STATES DISTRICT JUDGE